

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

CAMERON MEYERS,	)	
Plaintiff	)	
	)	
vs.	)	No. 1:20-cv-01922-MJD-SEB
	)	
WAL-MART STORES EAST, LP and	)	
HARBORTOWN INDUSTRIES, INC.,	)	
Defendants.	)	

**AMENDED**  
**COMPLAINT FOR DAMAGES**

Comes now the Plaintiff, by counsel, and for his cause of action against the Defendants, each of them, alleges:

1. At all times hereinafter mentioned Defendant Wal-Mart Stores East, LP owned, operated and maintained a retail store located at 4200 Western Avenue, in Fayette County, Indiana.
2. On or about May 7<sup>th</sup>, 2019 Plaintiff was an invitee on Defendant's premises when he picked up a picture frame from a display area and the frame separated causing the glass to fall on his lower extremity.
3. The picture frame at issue was manufactured by Hong Kong Company Intco International (HK) Co., LTD and distributed by Defendants Wal-Mart Stores East, LP and/or Harbortown Industries, Inc.

4. The Court does not have jurisdiction over Intco International (HK) Co., LTD and, therefore, Defendants Wal-Mart Stores East, LP and Harbortown Industries, Inc., who are the distributors and sellers of the picture frame product, are also deemed the manufacturer pursuant to I.C.34-20-2-4.

5. The incident was caused by the negligence of the Defendants, each of them, and their violation of the Indiana Product Liability Act.

6. As a proximate result of the Defendants' negligence, each of them, and violation of the Indiana Product Liability Act, Plaintiff has been injured and damaged, incurred reasonable medical expenses, endured pain, suffering and mental anguish and lost income and earning capacity.

WHEREFORE, Plaintiff prays for judgment against the Defendants, each of them, in an amount which willfully and fairly compensate him for his injuries and damages, for his costs, and for all other proper relief.

Respectfully submitted,

TOWNSEND & TOWNSEND, LLP

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*Counsel for Plaintiff, Cameron Meyers*

**CERTIFICATE OF SERVICE**

I certify that on October 15, 2020, a copy of the foregoing **Amended Complaint for Damages** was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the court's electronic filing system. Parties may access this filing through the court's system.

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Meyers, C. Plaintiff's Proposed Amended Complaint.101520.wpd